

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ZAG AMERICA, LLC,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No.: 1:20-cv-00013

Judge Robert W. Gettleman

Magistrate Judge Sidney I. Schenkier

**PLAINTIFF’S *EX PARTE* MOTION FOR ENTRY OF A  
TEMPORARY RESTRAINING ORDER, INCLUDING A TEMPORARY INJUNCTION,  
A TEMPORARY ASSET RESTRAINT, AND EXPEDITED DISCOVERY**

Plaintiff, ZAG AMERICA, LLC (“ZAG” or “Plaintiff”), seeks entry of an *Ex Parte* Temporary Restraining Order, including a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale, and sale of infringing and counterfeit ZAG AMERICA, LLC products, a temporary asset restraint, and expedited discovery in an action arising out of 15 U.S.C. § 1114; Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); and the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510, *et seq.* A Memorandum of Law in Support is filed concurrently with this Motion.

Dated: February 3, 2020

Respectfully submitted,

/s/ Ann Marie Sullivan

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Alison Carter

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***ATTORNEYS FOR PLAINTIFF***